

REMARKS

The Office Action dated May 25, 2006, has been carefully reviewed and the foregoing amendment has been made in response thereto. Claims 1 and 3-21 are pending in the application.

The rejection of claims 1 and 3-21 under 35 USC §103(a) as being unpatentable over Sari et al in view of Lau, Sheynblat, and either one of Ayed or Brust et al is respectfully traversed.

The references in the rejection fail to teach or suggest the claimed system as a whole. For example, amended claim 1 recites transmitting predetermined aiding data from the first local data transceiver when within reception range of the first local data transceiver and processing fob location data in response to the predetermined aiding data. Moreover, fob location data is transmitted from the fob transceiver to the vehicle transceiver, and the vehicle-mounted location unit determines a bearing and transmits the bearing to the fob transceiver. Thus, even the original claims provided that the vehicle and the fob determine their simultaneous locations.

In order to distinguish this aspect of the invention even more clearly, claims 1 and 11 have been amended to recite that fob location and vehicle location are determined concurrently. By comparing those simultaneously determined locations, the vehicle unit determines a bearing of the fob to the vehicle. Thus, all the recited operations occur while the transceivers are in range because the fob must obtain aiding data from the vehicle unit, the vehicle unit must obtain the position of the fob from the fob, and the fob must obtain the instantaneous bearing from the vehicle unit. Considering the claimed system as a whole, operations are performed that are neither shown nor suggested by the cited references. Therefore, claims 1 and 3-21 are patentable over the combination of Sari et al, Lau, Sheynblat, Ayed, and Brust et al.

On page 6, the rejection alleges that "there is nothing in any of the references to suggest that the communications do not operate in a like fashion." This misstates the appropriate standard for determining obviousness. In order to establish a *prima facia* case of obviousness, the references must provide an actual teaching or

suggestion of the claimed subject matter. These references lack such teaching or suggestion with respect to the limitation noted above.

In view of the foregoing amendment and remarks, claims 1 and 3-21 are now in condition for allowance. Favorable action is respectfully solicited.

Respectfully submitted,



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